

STATE OF TENNESSEE

Office of the Attorney General



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September 18, 2003

Honorable Deborah Taylor Tate  
Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

**RE: PETITION OF CHATTANOOGA GAS COMPANY, NASHVILLE GAS COMPANY, A  
DIVISION OF PIEDMONT NATURAL GAS COMPANY, INC., AND UNITED CITIES  
GAS COMPANY, A DIVISION OF ATMOS ENERGY CORPORATION FOR A  
DECLARATORY RULING REGARDING THE COLLECTIBILITY OF THE GAS COST  
PORTION OF UNCOLLECTIBLE ACCOUNTS UNDER THE PURCHASED GAS  
ADJUSTMENT ("PGA") RULES  
Docket No. 03-00209**

Dear Chairman Tate:

Enclosed is an original and thirteen copies of a Motion for Extension of Time of the Consumer Advocate and Protection Division of the Office of the Attorney General in the above-referenced matter. Kindly file the attached in this docket. By copy of this letter, we are serving all parties of record. If you have any questions, please feel free to contact me at (615) 532-3382. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Shilina B. Chatterjee".

Shilina B. Chatterjee  
Assistant Attorney General  
(615) 532-3382

Enclosures

cc: Kim Beals, Esq.  
Hearing Officer  
All Parties of Record

68949

**IN THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

**IN RE:**

**PETITION OF CHATTANOOGA GAS  
COMPANY, NASHVILLE GAS COMPANY, A  
DIVISION OF PIEDMONT NATURAL GAS  
COMPANY, INC., AND UNITED CITIES GAS  
COMPANY, A DIVISION OF ATMOS  
ENERGY CORPORATION FOR A  
DECLARATORY RULING REGARDING THE  
COLLECTIBILITY OF THE GAS COST  
PORTION OF UNCOLLECTIBLE  
ACCOUNTS UNDER THE PURCHASED GAS  
ADJUSTMENT ("PGA") RULES**

**DOCKET NO. 03-00209**

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**CONSUMER ADVOCATE AND PROTECTION DIVISION OF THE OFFICE  
OF THE ATTORNEY GENERAL'S MOTION FOR EXTENSION OF TIME**

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Comes Paul G. Summers, the Attorney General and Reporter, through the Consumer Advocate and Protection Division of the Office of Attorney General (hereinafter "CAPD" or "Consumer Advocate") respectfully moves for an extension of time for filing of direct testimony.

As grounds for this motion, the CAPD states that:

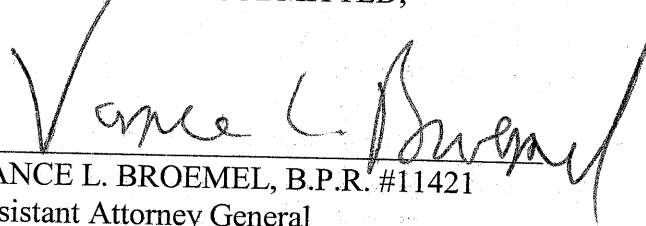
1. The CAPD served their Discovery Request upon Atmos on July 28, 2003.
2. Discovery responses were due on August 14, 2003. Thereafter, on August 13, 2003, the parties sought an extension of time to respond until August 21, 2003. On August 21, 2003, Atmos' counsel, indicated that they were having problems with their computers related to the recent computer virus and sought an extension to file until August 26, 2003.

3. On August 26, 2003, Atmos contacted the CAPD and indicated that their client's main contact had an illness and counsel for Chattanooga Gas Company had a death in the family and requested another extension of time. The CAPD agreed to allow for another extension of time and responses were due to discovery by August 29, 2003.
4. On August 29, 2003, Atmos failed to file their discovery response. They finally filed their discovery response on September 8, 2003, 10 days after the filing deadline.
5. Atmos' and Chattanooga Gas Company's discovery responses were incomplete and unresponsive. On September 15, 2003, the CAPD sent a letter to counsel for Atmos and Chattanooga Gas Company requesting complete responses to the CAPD's discovery request.
6. Direct testimony in this matter is due on Friday, September 25, 2003. Due to the various delays and incomplete data responses, the CAPD is unable to completely prepare its direct testimony by September 25, 2003.

CAPD's discovery requests were designed to discover the details of the action that Atmos is proposing they be permitted to take and prepare expert testimony. The schedule established requires pre-filed testimony to be filed on September 25, 2003. In all fairness to the parties, and for the orderly development and presentation of the issues in this matter, it is appropriate and necessary for Atmos and Chattanooga Gas Company to completely and comprehensively respond to each and every one of the CAPD's discovery requests. Furthermore, in light of the late filing by Atmos and other delays in this matter, we hereby request that the dates for the filing of direct testimony and rebuttal testimony be postponed. We propose that direct testimony be postponed until Thursday, October 9, 2003, provided full responses are received from Atmos and Chattanooga Gas Company by a reasonable time before that time. Also, we request that rebuttal testimony be due on October 23, 2003. Based on the above extensions of time in filing and the 10 day late filing by Atmos, we respectfully request that this extension of time for filing of direct

testimony and rebuttal testimony be granted.

RESPECTFULLY SUBMITTED,



VANCE L. BROEMEL, B.P.R. #11421

Assistant Attorney General

Office of the Attorney General

Consumer Advocate and Protection Division

(615) 741-8733



SHILINA B. CHATTERJEE, B.P.R. #20689

Assistant Attorney General

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Consumer Advocate and Protection Division

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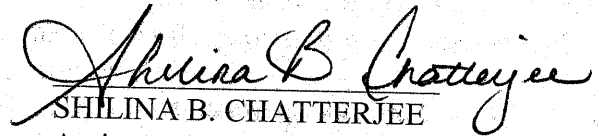
Nashville, Tennessee 37202

(615) 532-3382

Dated: September 18, 2003

**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing has been forwarded by facsimile and/or first-class mail, postage prepaid, on the 18th day of September, 2003 to the following:

  
SHILINA B. CHATTERJEE  
Assistant Attorney General

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